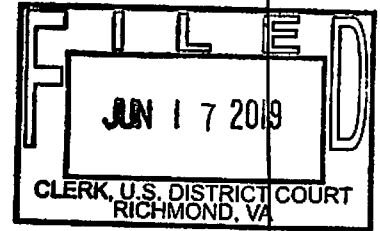


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION



ROBERT DAVID STEELE, et al.,

Plaintiff,

vs.

JASON GOODMAN, et al.,

Defendant

Case No.: 3:17-cv-00601-MHL

DEFENDANT'S INITIAL DISCLOSURE  
STATEMENT

**RULE 26(A)1 INITIAL DISCLOSURE STATEMENT**

Comes now, Defendant Jason Goodman, Pro Se, pursuant to Federal Rule of Civil Procedure 26(a)(1) to submit his disclosures as follows. Defendant reserves the right to supplement his disclosure statement as continuing investigation and discovery may alter this disclosure and/or identify other potential witnesses, documents, and information.

1 1. Individuals likely to have discoverable material

- 2
- 3 a. Robert David Steele (knowledge regarding the allegations set forth in the
- 4 Complaint and the denials, defenses, and allegations set forth in the
- 5 Defendants' Answers) c/o Steven S. Biss (VSB No. 32972) E-mail:
- 6 stevenbiss@earthlink.net 300 West Main Street, Suite 102 Charlottesville,
- 7 Virginia 22903 Phone: (804) 501-8272 Fax: (202) 318-4098 Counsel for
- 8 Plaintiffs
- 9
- 10
- 11 b. Representative of Earth Intelligence Network (knowledge regarding the
- 12 allegations set forth in the Complaint and the denials, defenses, and
- 13 allegations set forth in the Defendants' Answers) c/o Steven S. Biss (VSB
- 14 No. 32972) E-mail: stevenbiss@earthlink.net 300 West Main Street, Suite 102
- 15 Charlottesville, Virginia 22903 Phone: (804) 501-8272 Fax: (202) 318-
- 16 4098 Counsel for Plaintiffs
- 17
- 18
- 19
- 20 c. Devin Nunes (associate of plaintiff knowledge regarding the allegations set
- 21 forth in the Complaint and the denials, defenses, and allegations set forth in
- 22 the Defendants' Answers) 264 Clovis Avenue Suite 206 Clovis, CA 93612
- 23 Main: (559) 323-5235 Fax: (559) 323-5528
- 24
- 25
- 26 d. Jason Goodman (knowledge regarding the allegations set forth in the
- 27 Complaint and the denials, defenses, and allegations set forth in the
- 28

1 Defendants' Answers) 252 7<sup>th</sup> Avenue Apt 6s New York NY 10001 Pro Se  
2 Defendant  
3

4  
5 e. Patricia A. Negron (knowledge regarding the allegations set forth in the  
6 Complaint and the denials, defenses, and allegations set forth in the  
7 Defendants' Answers) c/o R. Johan Conrod, Jr. (VSB No. 46765) E-mail:  
8 rjconrod@kaufcan.com KAUFMAN & CANOLES, P.C. 150 West Main  
9 Street, Suite 2100 Norfolk, VA 23510 Phone: (757) 624-3000 Fax: (888) 360-  
10 9092 Terry C. Frank, Esq. (VSB No. 74890) E-mail: tcfrank@kaufcan.com  
11 Benjamin A. Wills, Esq. (VSB No. 88109) E-mail: bawills@kaufcan.com  
12 KAUFMAN & CANOLES, P.C. 1021 E. Cary Street, Suite 1400 Richmond,  
13 Virginia 23219 Phone: (804) 771-5700 Fax: (888) 360-9092 Counsel for  
14 Defendant Patricia A. Negron  
15  
16

17  
18 f. Susan A. Lutzke a/k/a Queen Tut1 (knowledge regarding the allegations set  
19 forth in the Complaint and the denials, defenses, and allegations set forth in  
20 the Defendants' Answers) 1221 University Ave., Unit D202 Fort Collins, CO  
21 80521 Pro se Defendant  
22  
23

24 g. D. George Sweigert (potential knowledge regarding the online activities of the  
25 parties related to the allegations set forth in the Amended Complaint and the  
26 Defendants' Answers) c/o P.O. Box 152 Mesa, AZ 85211 Prospective Pro se  
27 Intervenor  
28

- 1
- 2 h. George Webb Sweigert (brother of D. George Sweigert with potential
- 3 knowledge regarding the online activities of the parties related to the
- 4 allegations set forth in the Amended Complaint and the Defendants' Answers)
- 5 Country Inn and Suites by Raddison 8850 Hampton Mall Dr N, Capitol
- 6 Heights, MD 20743 (503) 919-0748
- 7
- 8
- 9 i. Dr. Cynthia Ann McKinney (knowledge of the allegations set forth in the
- 10 Amended Complaint and the Defendants' Answers specifically with respect to
- 11 the Plaintiffs' #UNRIG campaign, its operation, and donations thereto)
- 12 Address and number unknown.
- 13
- 14
- 15 j. Manuel Chavez III (Former Associate of Plaintiff and recent associate of D.
- 16 George Sweigert with knowledge regarding the allegations set forth in the
- 17 Complaint and the denials, defenses, and allegations set forth in the
- 18 Defendants' Answers). Address unknown (480) 332-9117
- 19
- 20
- 21 k. Tyroan Simpson (Former Associate of Plaintiff and recent associate of D.
- 22 George Sweigert with knowledge regarding the allegations set forth in the
- 23 Complaint and the denials, defenses, and allegations set forth in the
- 24 Defendants' Answers). Address and phone number unknown
- 25
- 26
- 27
- 28

- 1           l. Nathan Stolpman (Former Associate of Plaintiff and recent associate of D.  
2           George Sweigert with knowledge regarding the allegations set forth in the  
3           Complaint and the denials, defenses, and allegations set forth in the  
4           Defendants' Answers). Address and phone number unknown  
5  
6
- 7           m. Jacquelyn Weaver (associate of D. George Sweigert with knowledge  
8           regarding the allegations set forth in the Complaint and the denials, defenses,  
9           and allegations set forth in the Defendants' Answers). 102 Fern Purvis, MS  
10          39475 jacquelyn113@hotmail.com  
11
- 12  
13          n. Steve Outtrim (associate of D. George Sweigert and co-Defendant Lutzke  
14          with knowledge regarding the allegations set forth in the Complaint and the  
15          denials, defenses, and allegations set forth in the Defendants' Answers). 90  
16          Franklin Road Freemans Bay Auckland 1011 New Zealand  
17
- 18  
19          o. Kevin Marsden (associate of D. George Sweigert with knowledge regarding  
20          the allegations set forth in the Complaint and the denials, defenses, and  
21          allegations set forth in the Defendants' Answers).  
22
- 23  
24          p. Jake Morphonios (associate of D. George Sweigert and co-Defendant Lutzke  
25          with knowledge regarding the allegations set forth in the Complaint and the  
26          denials, defenses, and allegations set forth in the Defendants' Answers).  
27          [morphonios@yahoo.com](mailto:morphonios@yahoo.com)  
28

- 1 q. Dean Fougere (associate of D. George Sweigert with knowledge regarding the  
2 allegations set forth in the Complaint and the denials, defenses, and  
3 allegations set forth in the Defendants' Answers) 154 Lake Drive Plymouth  
4 MA 02360 (508) 329-2046  
5
- 6 r. Quinn Michaels (AKA Corey Aiken)(former associate of Defendant Goodman  
7 with knowledge regarding the allegations set forth in the Complaint and the  
8 denials, defenses, and allegations set forth in the Defendants' Answers)  
9 address unknow phone number (503) 395-xxxx  
10

11 2. Documents

12 The Defendant intends to use the following documents in support of his case

- 13 a. All documents identified and referred to in the parties' pleadings, including  
14 documents that are linked via internet URLs  
15
- 16 b. All documents produced in discovery by the parties;  
17
- 18 c. E-mails exchanged between Defendant Goodman and Plaintiff  
19
- 20 d. E-mails exchanged between Defendant Goodman and Co-Defendant Negron.  
21
- 22 e. E-mails exchanged between Defendant Goodman and Co-Defendant Lutzke  
23
- 24 f. E-mails and telephone calls between Defendant Goodman and Counsel for  
Plaintiff
- 25 g. E-mails and telephone calls between Defendant Goodman and William F.  
Kernan
- 26 h. All documents produced by third-parties in response to Rule 45 Subpoenas.

27 3. Damages  
28

1 Defendant Goodman is not claiming any damages at this time but reserves his right to  
2 amend that in the future.

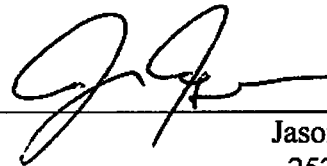
3 4. Insurance

4 There is no applicable insurance.

5  
6  
7 Defendant reserves the right to amend and supplement these Rule 26(a)(1) Disclosures in  
8 accordance with the Rule 26 FRCP.

9  
10 DATED: June 14, 2019

11  
12 Respectfully submitted,

13  
14  
15  
16  
17 

18 Jason Goodman, Pro Se  
19 252 7<sup>th</sup> Avenue Apt 6s  
20 New York, NY 10001  
21 [truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
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ROBERT DAVID STEELE, et al.,

Plaintiff,

vs.

JASON GOODMAN, et al.,

Defendant

Case No.: 3:17-cv-00601-MHL

DEFENDANT'S SWORN STATEMENT

DEFENDANT'S SWORN STATEMENT

I hereby attest that the pleadings herein are accurate and true under penalties of perjury.

Signed this \_\_14\_\_ day of June 2019

  
\_\_\_\_\_  
Defendant, Pro Se Jason Goodman



UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
\_\_\_\_\_  
DIVISION

ROBERT DAVID STEELE, et al.,  
\_\_\_\_\_

Plaintiff(s),

v.

Civil Action Number: 3:17-cv-00601-MHL

JASON GOODMAN, et al.,  
\_\_\_\_\_

Defendant(s).

**LOCAL RULE 83.1(M) CERTIFICATION**


**I declare under penalty of perjury that:**

DEFENDANT'S INITIAL DISCLOSURE  
STATEMENT

**No attorney has prepared, or assisted in the preparation of \_\_\_\_\_**

JASON GOODMAN  
\_\_\_\_\_

Name of *Pro Se* Party (Print or Type)

  
\_\_\_\_\_  
Signature of *Pro Se* Party

Executed on: June 14, 2019 \_\_\_\_\_ (Date)

**OR**

**The following attorney(s) prepared or assisted me in preparation of \_\_\_\_\_.**  
**(Title of Document)**

\_\_\_\_\_  
(Name of Attorney)

\_\_\_\_\_  
(Address of Attorney)

\_\_\_\_\_  
(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document

\_\_\_\_\_  
(Name of *Pro Se* Party (Print or Type)

\_\_\_\_\_  
Signature of *Pro Se* Party

Executed on: \_\_\_\_\_ (Date)

**Circuit Court for** Eastern Division Virginia

**Case No.** 3:17-cv-601-MHL

**City or County**

Robert David Steele and Earth Intelligence Networ

Jason Goodman

**Name**

**Name**

11005 LANGTON ARMS CT

252 7th avenue

6s

**VS.**

**Street Address**

**Apt. #**

**Street Address**

**Apt. #**

OAKTON, VA 22124 ( 571 ) 320-8573

New York NY 10001 ( 323 ) 744-7594

**City State Zip Code Area Telephone**  
**Code**

**City State Zip Code Area Telephone**  
**Code**

*Plaintiff*

*Defendant*

## CERTIFICATE OF SERVICE

(DOMREL58)

I HEREBY CERTIFY that on this 14 day of June, 2019, a copy  
of the document(s) entitled DEFENDANT'S INITIAL DISCLOSURE STATEMENT

**Title of Document(s)**  
was/were mailed, postage prepaid to:

Terry Frank Kaufman & Canoles

**Opposing Party or His/Her Attorney**

1021 E. Cary Street, 14th Floor

**Address**

**City** Richmond **State** VA **Zip** 23219

June 14, 2019  
**Date**

  
**Signature**

**Circuit Court for** Eastern Division Virginia

**Case No.** 3:17-cv-601-MHL

**City or County**

Robert David Steele and Earth Intelligence Networ

Jason Goodman

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**City**

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**Zip Code**

**Area  
Code**

**Telephone**

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Code**

**Telephone**

**Plaintiff**

**Defendant**

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**Title of Document(s)**  
was/were mailed, postage prepaid to:

D. George Sweigert

**Opposing Party or His/Her Attorney**

PO Box 152

**Address**

**City** Mesa

**State** AZ

**Zip** 85211

June 14, 2019  
**Date**

  
**Signature**

**Circuit Court for** Eastern Division Virginia

**Case No.** 3:17-cv-601-MHL

**City or County**

Robert David Steele and Earth Intelligence Networ

Jason Goodman

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**State**

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*Plaintiff*

*Defendant*

**VS.**

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**Title of Document(s)**  
was/were mailed, postage prepaid to:

Susan Lutzke Holmes

**Opposing Party or His/Her Attorney**

2608 Leisure Dr Unit B

**Address**

Fort Collins

CO

80525

**City**

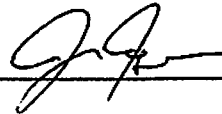
**State**

**Zip**

June 14, 2019

**Date**

**Signature**



**Circuit Court for** Eastern Division Virginia

**Case No.** 3:17-cv-601-MHL

**City or County**

Robert David Steele and Earth Intelligence Networ

Jason Goodman

**Name**

**Name**

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**VS.**

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**Apt. #**

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New York NY 10001 ( 323 ) 744-7594

**City State Zip Code Area Telephone**

**City State Zip Code Area Telephone**

**Plaintiff**

**Defendant**

## CERTIFICATE OF SERVICE

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**Title of Document(s)**  
was/were mailed, postage prepaid to:

Steven S Biss

**Opposing Party or His/Her Attorney**

300 West Main Street Suite 102

**Address**

**City** Charlottesville **State** VA **Zip** 22903

June 14, 2019  
**Date**

**Signature**

